

**UNITED STATES BANKRUPTCY COURT**  
**WESTERN DISTRICT OF TEXAS**  
**AUSTIN DIVISION**

IN RE:

§

§

Case No. 20-11161-tmd

Allan L. Reagan

§

§

Chapter 11

**OBJECTION TO FIRST AMENDED PLAN OF REORGANIZATION**

Creditor DT Chandler LLC objects to the First Amended Proposed Plan of Reorganization filed by Debtor herein, and as grounds thereof would show this Honorable Court:

1. Village @ La Orilla LLC's ("VLO") objection succinctly and clearly states the issue. Debtor does not qualify for Subchapter V treatment. To avoid repetition of the issue, DT Chandler LLC adopts VLO's objection. Dckt. #93.
2. VLO, again, succinctly and clearly identifies the issue with Debtor's liquidation analysis. To avoid repeating what VLO has clearly stated, DT Chandler LLC adopts VLO's objection to the issue. *Id.*

Debtor's First Amended Proposed Plan of Reorganization states, "Debtor believes several of the claims are subject to objection. In particular, certain of the underlying claims on which a guaranty exists are being paid, and other includes amounts which are not recoverable under the guaranty and/or the underlying obligation." Dckt. #50, § 2.07. DT Chandler LLC holds a guaranty, Debtor guaranteed a commercial lease, DT Chandler LLC is not being paid and Debtor is trying to acquire the tenant's FF&E to be used for Debtor's movie/brewhouse business activities with advice of counsel. The most efficient manner to administer the bankruptcy given Debtor's statement is to deny plan confirmation today or, at minimum, defer

before a decision is made on what claims Debtor plans to lodge an objection to, what claims Debtor plans not to object to and provide a clear disclosure as to what existing guaranty liabilities identified as creditors are in fact being paid.

*/s/Louis D. Lopez*

*Admitted Pro Hac Vice*

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United States Bankruptcy Court  
Western District of Texas

In re:

Case No. 20-1116

Allan L. Reagan

Debtor

Chapter 11

## CERTIFICATE OF NOTICE

District/off: 0542-1

Date Rcvd: March 15, 2021

**Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on March 15 2021:**

<b>Recip ID</b>	<b>Recipient Name and Address</b>
db	Allan L. Reagan, 2000 S. IH-35, Suite Q11, Round Rock, TX 78681-6942

TOTAL: 1

**Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.**

Electronic transmission includes sending notices via email (Email/text and Email/PDF), and electronic data interchange (EDI).

NONE

## BYPASSED RECIPIENTS

**The following addresses were not sent this bankruptcy notice due to an undeliverable address, \*duplicate of an address listed above, \*P duplicate of a preferred address, or ## out of date forwarding orders with USPS.**

NONE

## NOTICE CERTIFICATION

**I, Lisa Harris declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.**

**Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed .R. Bank. P.2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.**

Date: March 15, 2021 Signature: /s/Lisa Harris

## CM/ECF NOTICE OF ELECTRONIC FILING

**The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on February 21, 2021 at the address(es) listed below:**

**Name Email Address**

**Bruce John Zabarauskas** on behalf of Creditor Wells Fargo as Trustee for the benefit of the Holders of COMM 2014-UBS6 Mortgage Trust Commercial

**Mortgage Pass-Through** Certificates Series 2014-UBS6 bruce.zabarauskas@tklaw.com,  
tonya.loera@tklaw.com

**Caitlin C. Conklin** on behalf of Creditor Wyndham Franchisor LLC caitlin.conklin@klgates.com,  
joy.vanderweert@klgates.com

**Daniel M. Eliades** on behalf of Creditor Wyndham Franchisor LLC Daniel.eliades@klgates.com,  
caitlin.conklin@klgates.com;travis.powers@klgates.com

**David M Blau** on behalf of Creditor Merle Hay Investors LLC dblau@clarkhill.com

**David S Catuogno** on behalf of Creditor Wyndham Franchisor LLC david.catuogno@klgates.com,  
caitlin.conklin@klgates.com;aidan.nowak@klgates.com

**Harrel L. Davis, III** on behalf of Creditor ROP Artcraft LLC hdavis@eplawyers.com,  
vrust@eplawyers.com;vpena@eplawyers.com

**Jaimee L Witten** on behalf of Creditor Comerica Bank JWitten@bodmanlaw.com

**John R O'Connor** on behalf of Interested Party Flix Entertainment LLC joconnor@sfg.com

**Kell C. Mercer** on behalf of Interested Party Janet Reagan kell.mercer@merc-law-pc.com

**Mark Curtis Taylor** on behalf of Debtor Allan L. Reagan mark.taylor@wallerlaw.com  
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**Michael Flume** on behalf of Creditor The Bank of Austin mflume@flumelaw.net  
mmonge@flumelaw.net;sfume@flumelaw.net

**Michael G. Colvard** on behalf of Trustee Michael G. Colvard mcolvard@mdtlaw.com  
mcolvard@ecf.axosfs.com;amartinez@mdtlaw.com

**Michael G. Colvard** mcolvard@mdtlaw.com mcolvard@ecf.axosfs.com;amartinez@mdtlaw.com

**Noel J Ravenscroft** on behalf of Creditor Comerica Bank Nravenscroft@bodmanlaw.com

**Peter Lindborg** on behalf of Creditor Village @ La Orilla LLC plindborg@lmlp.com

**Robert J. Diehl, Jr.** on behalf of Creditor Comerica Bank RDiehl@bodmanlaw.com

**Ross A Plourde** on behalf of Creditor 83rd Street Development LLC ross.plourde@mcafeetaft.com,  
Annette.strother@mcafeetaft.com

**Stephen Wilcox** on behalf of Creditor Ford Motor Credit Company LLC swilcox@wilcoxlaw.net  
krw77@sbcglobal.net;kraudry@wilcoxlaw.net

**Stephen K. Lecholop, II** on behalf of Creditor Lone Star National Bank slecholop@rpsalaw.com  
amartinez@rpsalaw.com;lchapa@rpsalaw.com

**Tara LeDayon** behalf of Creditor Williamson County

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alocklin@mvalaw.com

United States Trustee - AU12

ustpregion07.au.ecf@usdoj.gov

**William T. Peckham** on behalf of Creditor Mikeska Monahan & Peckham  
wpeckham@peckhamlawaustin.com, calexander@peckhamlawaustin.com